

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK

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| In re: | : Chapter 11 |
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| ORION HEALTHCORP, INC. | : Case No. 18-71748 (AST) |
| CONSTELLATION HEALTHCARE TECHNOLOGIES, INC. | : Case No. 18-71749 (AST) |
| NEMS ACQUISITION, LLC | : Case No. 18-71750 (AST) |
| NORTHEAST MEDICAL SOLUTIONS, LLC | : Case No. 18-71751 (AST) |
| NEMS WEST VIRGINIA, LLC | : Case No. 18-71752 (AST) |
| PHYSICIANS PRACTICE PLUS, LLC | : Case No. 18-71753 (AST) |
| PHYSICIANS PRACTICE PLUS HOLDINGS, LLC | : Case No. 18-71754 (AST) |
| MEDICAL BILLING SERVICES, INC. | : Case No. 18-71755 (AST) |
| RAND MEDICAL BILLING, INC. | : Case No. 18-71756 (AST) |
| RMI PHYSICIAN SERVICES CORPORATION | : Case No. 18-71757 (AST) |
| WESTERN SKIES PRACTICE MANAGEMENT, INC. | : Case No. 18-71758 (AST) |
| INTEGRATED PHYSICIAN SOLUTIONS, INC. | : Case No. 18-71759 (AST) |
| NYNM ACQUISITION, LLC | : Case No. 18-71760 (AST) |
| NORTHSTAR FHA, LLC | : Case No. 18-71761 (AST) |
| NORTHSTAR FIRST HEALTH, LLC | : Case No. 18-71762 (AST) |
| VACHETTE BUSINESS SERVICES, LTD. | : Case No. 18-71763 (AST) |
| MDRX MEDICAL BILLING, LLC | : Case No. 18-71764 (AST) |
| VEGA MEDICAL PROFESSIONALS, LLC | : Case No. 18-71765 (AST) |
| ALLEGIANCE CONSULTING ASSOCIATES, LLC | : Case No. 18-71766 (AST) |
| ALLEGIANCE BILLING & CONSULTING, LLC | : Case No. 18-71767 (AST) |
| PHOENIX HEALTH, LLC | : Case No. 18-71789 (AST) |
| NEW YORK NETWORK MANAGEMENT, L.L.C. | : Case No. 18-74545 (AST) |
| | : |
| Debtors. | : (Jointly Administered) |
| -----x | |
| | : |
| HOWARD M. EHRENBURG, | : |
| CHAPTER 11 LIQUIDATING TRUSTEE, | : Adv. Pro. No. 20-08053 (AST) |
| | : |
| Plaintiff, | : |
| | : |
| v. | : |
| | : |
| SAGE GROUP CONSULTING, INC., AND SALIL SHARMA, | : |
| | : |
| Defendants. | x |
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**REQUEST FOR ENTRY OF DEFAULT AGAINST
DEFENDANT SAGE GROUP CONSULTING, INC.**

Upon the annexed declaration of Joshua A. Kane, and for the reasons stated therein, Plaintiff Liquidating Trustee Howard M. Ehrenberg, by his undersigned counsel, respectfully requests that the Clerk of the United States Bankruptcy Court for the Eastern District of New York enter Defendant Sage Group Consulting, Inc.'s default pursuant to Rule 55(a) of the Federal Rules of Civil Procedure, made applicable to this adversary proceeding by Rule 7055 of the Federal Rules of Bankruptcy Procedure.

Dated: New York, New York
July 9, 2021

DLA Piper LLP (US)

/s/ Michael D. Hynes
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